

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

FAIR ISAAC CORPORATION, a Delaware corporation,	)	Case No. 16-cv-1054 (WMW/DTS)
	)	
	)	
Plaintiff,	)	
	)	
v.	)	
	)	
FEDERAL INSURANCE COMPANY, an	)	
Indiana corporation, and ACE AMERICAN	)	
INSURANCE COMPANY, a Pennsylvania	)	
corporation.	)	
	)	
Defendants.	)	
	)	

**JOINT MOTION REGARDING CONTINUED SEALING**

Documents have been filed under temporary seal in connection with the following letter requests:

Defendant's Response to Letter Request, Dkt. No. 182  
Plaintiff's Letter Request, Dkt. No. 184  
Defendant's Response to Letter Request, Dkt. No. 193

Pursuant to LR 5.6, the parties submit this Joint Motion Regarding Continued Sealing.

DKT. NO.	DESCRIPTION OF DOCUMENT	MARK "X" IN APPLICABLE COLUMN			NONPARTY THAT DESIGNATED DOC. CONFIDENTIAL (IF ANY)	REASON WHY DOCUMENT SHOULD REMAIN SEALED OR BE UNSEALED
		Parties Agree Doc. Should Remain Sealed	Parties Agree Doc. Should Be Unsealed	Parties Disagree		
182	Unredacted copy of Defendant's Letter Request to Magistrate Judge Schultz regarding Federal's 30(b)(6) Deposition Topic Nos. 4, 6 and 9	X			N/A	This document should remain sealed. The quoted testimony of William Waid in the unredacted letter request reveals FICO's confidential pricing information and pricing processes, including its application-based pricing model. FICO would experience economic harm, including competitive harm, if the pricing information in this document was made public. FICO's competitors could use this information to target FICO's customers and undercut FICO's pricing. Public knowledge of FICO's pricing information would also place FICO at a disadvantage when negotiating

						with potential customers.  This commercial confidential information was designated Confidential, Attorneys' Eyes Only under the Protective Order and should remain sealed.
182 – Tab A	Plaintiff Fair Isaac Corporation's Second Supplemental Answers to Defendant's Interrogatory Nos. 6-9	X			N/A	This document should remain sealed. FICO's Second Supplemental Answers to Federal's Interrogatory Nos. 6-9 included in Tab A reveal FICO's confidential pricing information and pricing processes, including its application-based pricing model. FICO would experience economic harm, including competitive harm, if the pricing information in this document was made public. FICO's competitors could use this information to target FICO's customers and undercut FICO's pricing. Public knowledge of FICO's pricing information would also place FICO at a disadvantage when negotiating with potential customers.

						This commercial confidential information was designated Confidential, Attorneys' Eyes Only under the Protective Order and should remain sealed.
182 – Tab B	Excerpts from the Deposition Transcript of William Waid dated January 16, 2019	X			N/A	<p>This document should remain sealed. The testimony of William Waid included in Tab B reveals FICO's confidential pricing information and pricing processes, including its application-based pricing model and enterprise pricing model. FICO would experience economic harm, including competitive harm, if the pricing information in this document was made public. FICO's competitors could use this information to target FICO's customers and undercut FICO's pricing. Public knowledge of FICO's pricing information would also place FICO at a disadvantage when negotiating with potential customers.</p> <p>This commercial confidential</p>

						information was designated Confidential, Attorneys' Eyes Only under the Protective Order and should remain sealed.
184	Unredacted copy of Plaintiff's Letter Request to Magistrate Judge Schultz regarding Interrogatory Nos. 16-20	X			N/A	This document was filed under seal to protect Defendants' commercially confidential information. This commercially confidential information, including the deposition testimony of Henry Mirolyuz, was designated Confidential, Attorneys' Eyes Only under the Protective Order.
187	Exhibit B to Plaintiff's Letter Request to Magistrate Judge Schultz regarding Interrogatory Nos. 16-20	X			N/A	This document was filed under seal to protect Defendants' commercially confidential information. This commercially confidential information, including the deposition testimony of Henry Mirolyuz, was designated Confidential, Attorneys' Eyes Only under the Protective Order.
188	Exhibit C to Plaintiff's Letter Request to Magistrate Judge Schultz regarding Interrogatory Nos. 16-20	X			N/A	This document was filed under seal to protect Defendants' commercially confidential information. This commercially

						confidential information, including Defendants' financial information, was designated Confidential, Attorneys' Eyes Only under the Protective Order.
189	Exhibit D to Plaintiff's Letter Request to Magistrate Judge Schultz regarding Interrogatory Nos. 16-20	X			N/A	This document was filed under seal to protect Defendants' commercially confidential information. This commercially confidential information, including Defendants' financial information, was designated Confidential, Attorneys' Eyes Only under the Protective Order.
193	Unredacted copy of Defendant's Response to Letter Request to Magistrate Judge Schultz regarding Interrogatory Nos. 16-20	X			N/A	The document was filed under seal to protect Defendants' confidential information. This commercially confidential information, including Defendants' financial information and the deposition testimony of Ramesh Pandey and Henry Mirolyuz, was designated Confidential, Attorneys' Eyes Only under the Protective Order.
194	Exhibit A to Defendant's Response to Letter Request	X				This document was filed under seal to protect Defendants'

	to Magistrate Judge Schultz regarding Interrogatory Nos. 16-20					commercially confidential information, including Defendants' financial information.
195	Exhibit B to Defendant's Response to Letter Request to Magistrate Judge Schultz regarding Interrogatory Nos. 16-20	X				This document was filed under seal to protect Defendants' commercially confidential information. This commercially confidential information, including Defendants' financial information, was designated Confidential, Attorneys' Eyes Only under the Protective Order.
196	Exhibit C to Defendant's Response to Letter Request to Magistrate Judge Schultz regarding Interrogatory Nos. 16-20	X				This document was filed under seal to protect Defendants' commercially confidential information. This commercially confidential information, including the deposition testimony of Ramesh Pandey, was designated Confidential, Attorneys' Eyes Only under the Protective Order.
197	Exhibit D to Defendant's Response to Letter Request to Magistrate Judge Schultz regarding Interrogatory Nos. 16-20	X				This document was filed under seal to protect Defendants' commercially confidential information. This commercially confidential information,

						including the deposition testimony of Ramesh Pandey, was designated Confidential, Attorneys' Eyes Only under the Protective Order.
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Dated: February 20, 2019

/s/ Heather Kliebenstein

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